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July 31, 2001

RECEIVED

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

BY HAND

Magalie Roman Salas, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

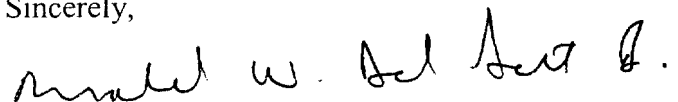
**Re: Policy and Rules Concerning the Interstate, Interexchange
Marketplace; Implementation of Section 254(g) of the
Communications Act of 1934, as amended, CC Docket No. 96-
61**

Dear Ms. Salas:

On behalf of IT&E Overseas, Inc. ("IT&E"), please associate the attached letter in the file of the above-captioned proceeding. This letter was delivered yesterday to the persons at the Commission indicated on the letter. This letter comments on the issue of a code sharing arrangement between America Samoa and Guam.

In accordance with Section 1.1206(b)(2) of the Commission's rules, an original and two copies of this letter are being filed with your office for inclusion in the public record. Please date stamp and return the enclosed extra copy of this filing. If you have any questions, please do not hesitate contact Ron Del Sesto at (202) 945-6923.

Sincerely,



Patrick J. Donovan
Ronald W. Del Sesto, Jr.

Enclosures

cc: Dorothy Atwood, Chief, Common Carrier Bureau
Diane Griffith Hamon, Acting Chief, Network Services Division, CCB
Cheryl Callahan, Network Services Divisions, CCB

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July 30, 2001

Mr. Norman Epstein
Moderator, Industry Numbering Committee
Alliance for Telecommunications Industry Solutions
C O Verizon
700 Hidden Ridge
HQB02H72
Irving, TX 75038

Re: Code Sharing between Guam and American Samoa

Dear Mr. Epstein:

IT&E Overseas, Inc. ("IT&E") submits this letter to oppose any area code-sharing arrangement between Guam and American Samoa. IT&E provides long distance, private line, and Internet access services to consumers and businesses in Guam and the Commonwealth of the Northern Marianas ("CNMI"). IT&E also provides wireless digital PCS services in Guam.

By letter dated March 23, 2001, the Governor of American Samoa submitted a request to the Director of the North American Numbering Plan Administration asking that American Samoa be allowed to participate in the North American Numbering Plan. As part of this request, American Samoa asked that it receive NPA 684, which corresponds to the international dialing code now in use for American Samoa. It is our understanding that the Industry Numbering Committee ("INC") has informally requested American Samoa to consider sharing an area code with Guam.

Area code sharing between Guam and American Samoa would impose prohibitive costs on consumers in both Guam and American Samoa. Both local and long distance service providers would be required to purchase expensive upgrades to, or replace, switching equipment in order to be able determine whether a call should be terminated to a customer in Guam or American Samoa. Instead of analyzing a telephone number at the NPA level, code sharing would require analysis of each dialed telephone number at the "NXX" level (NPA-NXX).

For its part, IT&E would need to incur very large expenses for both its long distance and PCS services. IT&E estimates that the total cost for software upgrades and or switch replacement would be approximately \$6 million. And these are only

IT&E's expenses. The Guam Telephone Authority would likely experience greater levels of expense. Other PCS providers in Guam would also incur expenses, not to mention long distance and local service providers serving American Samoa. The total cost for all these carriers to implement area code sharing for Guam and American Samoa could be many multiples of IT&E's expenses.

At the present time, and for many years, Guam, the CNMI, and American Samoa have been experiencing a very significant economic recession, even when the rest of the U.S. economy was growing rapidly. Most of the costs that carriers would incur in implementing area code sharing would of necessity be passed on to customers in prices for telecommunications services that could make service unaffordable for some consumers and generally reduce demand for telecommunications services. Moreover, imposing these very significant costs on Guam-based carriers would likely place them at a competitive disadvantage with respect to other larger carriers that can more readily absorb these costs and spread them to customers nationwide. In this connection, insofar as area code sharing would be advisable for American Samoa, it may be preferable to consider doing so with Hawaii, where carriers and the local economy may be better able to bear this expense, and which is considerably closer to American Samoa than is Guam.

In any event, there is no reason to believe that incurring the costs of number sharing between Guam and American Samoa is necessary for efficient NPA utilization, or that any benefit to efficient NPA utilization would be justified by the very significant expense involved. In addition, to the best of IT&E's knowledge, significant sharing of area codes between distant islands would be unprecedented. Nor do distant points necessarily share significantly similar calling patterns that could otherwise make area code sharing acceptable.

It also worth noting that in a closely analogous area the FCC has made clear that number conservation goals should not impose significant costs on carriers. Thus, in delegating authority to state commissions to implement thousand-block number pooling trials, the Commission emphasized in several instances that state commissions may not require carriers to implement number portability solely for purposes of participating in number pooling.¹ Similarly, carriers serving Guam and American Samoa should not be required to incur the very significant expense of area code sharing, even assuming this were necessary in light of area code conservation goals.

¹ See, e.g., *California Pub. Utils. Comm'n Petition for Delegation of Additional Authority Pertaining to Area Code Relief and NXX Code Conservation Measures*, CC Docket No. 96-98, FCC 99-248 (rel. Sept. 15, 1999); *Florida Pub. Service Comm'n Petition to Federal Communications Comm'n for Expedited Decision for Grant of Authority to Implement Number Conservation Measures*, CC Docket No. 96-98, FCC 99-249 (rel. Sept. 15, 1999); *Massachusetts Dept. of Telecom. and Energy's Petition for Waiver of Section 52.19 to Implement Various Area Code Conservation Methods in the 508, 617, 781, and 978 Area Codes*, CC Docket No. 96-98, FCC 99-246 (rel. Sept. 15, 1999); *New York State Dept. of Pub. Service Petition for Additional Delegated Authority to Implement Number Conservation Measures*, CC Docket No. 96-98, FCC 99-247 (rel. Sept. 15, 1999).

For all these reasons, area code sharing between Guam and American Samoa should not be implemented.

IT&E also objects to the fact that carriers and other interested persons in Guam were not apparently requested by the INC to comment on possible consideration of area code sharing between Guam and American Samoa, even if this is only under consideration on an informal basis at this time. Insofar as this issue remains under consideration, IT&E requests that the INC fully inform interested parties in Guam so that they may meaningfully participate in the INC's deliberations.

Sincerely,



Patrick J. Donovan
Ronald Del Sesto, Jr.

Counsel for IT&E Overseas, Inc.

cc: John M. Borlas, President, IT&E Overseas, Inc.
Dorothy Atwood, Chief, Common Carrier Bureau
Diane Griffith Harmon, Acting Chief, Network Services Division
Cheryl Callahan, Network Services Division, Common Carrier Bureau
John R. Hoffman, Chairman, North American Numbering Council
Ron Conners, Director, North American Numbering Plan Administration
The Honorable Tauese P.F. Sunia, Governor, American Samoa
Aleki Sene, Executive Director, American Samoa Telecommunications Authority
Fagafaga Langkilde, Vice President, Blue Sky Communications
Harry M. Boertzel, Guam Public Utilities Commission
Vincent P. Arriola, Guam Telephone Authority